

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION

GREAT AMERICAN INSURANCE)	
COMPANY,)	
)	
Plaintiff,)	CIVIL ACTION NO. 1:05cv1213-CSC
)	
v.)	
)	
TOWN OF COTTONWOOD,)	
)	
Defendant.)	

PLAINTIFF'S INITIAL DISCLOSURES

GREAT AMERICAN INSURANCE COMPANY (GAIC) hereby serves its Initial Disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure. GAIC reserves the right to supplement these disclosures as additional information becomes known during discovery.

SPECIFIC DISCLOSURES

- (A) Individuals likely to have discoverable information:
1. Mr. Edward F. Dudley
Great American Insurance Company
2625 Concord Pike Suite E
Wilmington, DE 19803
 2. Mr. Johnny Mac Weed
Former president of Weed Contracting Company, Inc.
 3. Mr. David Hicks, P.E.
David Hicks and Associates
406 Dothan Road
Abbeville, AL 36310

4. Mr. Mark Pool
Houston County Engineer's Office
2400 Columbia Highway
Dothan, AL 36303
5. Mr. Bobby Monk
Former Mayor of Town of Cottonwood
5 Houston Street
Cottonwood, AL 36320
6. Mrs. Jolaine Reynolds
Town of Cottonwood Clerk
7. Representative of Hughes Supply Company
c/o Mr. Mark P. Williams
Norman, Wood, Kendrick & Turner
505 20th Street North
Birmingham, AL 35203
8. Mr. Daniell G. Hamm
Former Bankruptcy Trustee for Weed Contracting Company, Inc.
Law Offices of Keith & Hamm
235 South McDonough Street
Montgomery, AL 36104
9. Representative of Elmore Utilities, Inc.
103 Boles Street
Opp, Alabama 36067

(B) Documents

GAIC has various documents which support the allegations of its Complaint, including documents evidencing payments that GAIC made under the bonds issued on behalf of Weed Contracting Company, documents evidencing the remaining contract balance which the Town of Cottonwood owes GAIC, and documents evidencing payment by GAIC for equipment which the Town of Cottonwood has refused to return. All

documents are available for inspection and copying at the offices of Starnes & Atchison, LLP.

(C) Computation of Damages:

(1) Remaining contract balance owed to GAIC - \$172,806.22, plus pre-judgment interest, costs, and all other expenses to which GAIC is entitled.

(2) Judgment in an amount equal to the actual value at the time of conversion by the Town of Cottonwood of the construction materials which GAIC paid for, which includes pipe, hydrants and gate valves, together with all interest permitted by law, and all costs of this action.

(D) Insurance Coverage:

N/A.

s/L. Graves Stiff, III.
L. Graves Stiff, III.
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Brian A. Dodd
Bar Number: ASB-5193-D56B
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CERTIFICATE OF SERVICE

I hereby certify that on October 31, 2006, I electronically filed the foregoing with the Clerk of the Court which will send notification of such filing to the following:

Gary C. Sherrer
SHERRER, JONES & TERRY, P.C.
335 West Main Street
Dothan, Alabama 36302
Telephone: (334) 678-0100

Respectfully submitted,

s/L. Graves Stiff, III.

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